



P.O. BOX 2166 • SAVANNAH, GA 31402 • TEL. (912) 232-0211 • FAX (912) 233-2150
6002 Commerce Blvd Suite 115 • Garden City GA 31408 • <http://johnsjames.com>

CUSTOM HOUSE BROKER
TREAS. DEPT. LICENSE NO. 5611
INTERNATIONAL FREIGHT FORWARDER
FMC LIC. 0150-F
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December 10, 2014

BEFORE THE FEDERAL MARITIME COMMISSION

DOCKET NO. 13-05

OCEAN TRANSPORTATION INTERMEDIARY LICENSING AND
FINANCIAL RESPONSIBILITY REQUIREMENTS, AND GENERAL
DUTIES

I am Jan Fields, Corporate Manager at John S. James Co. and Chairman of the NCBFAA's Transportation Committee. John S. James Co. is a licensed OTI and maintains six offices in the South Atlantic area.

I am familiar with the issues raised by the NPRM and I am concerned about the issues therein. I support triennial update for licensed OTI's; however I do not agree the license should be "renewed". Although updates should be unnecessary as all OTIs are currently required to keep the Commission informed of any changes in their corporate structure, officers and directors, and locations of their headquarters and branch offices, I fear there are those licensed OTI's who are not diligent in their reporting.

I do not agree with the requirement for sureties to post a listing of claims made to them and feel this information is confidential. The posting of this information will likely be damaging to a firm who is potentially completely innocent of all allegations.

As a small firm we use agents throughout the world and carefully choose agents who are in line with our strict compliance programs. I feel it is an undue burden to require each agent to list everyone they represent.



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The elimination of the requirement for branch offices of NVOCCs and ocean forwarders to have \$10,000 bonds for each office is helpful and eases some of the burden on OTIs when additional offices are opened or closed.

Although not specifically addressed in this NPRM I support the total elimination of OTI rate tariff publication, in order to avoid any procedural requirements. I also support the elimination of the need for NVOCCs to file NVOCC Service Agreements (“NSAs”) or publish their essential terms.

Thank you for allowing me to submit my comments.

Respectfully,
Janet B. Fields
Corporate Manager